

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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ROBINSON, W.R.    Carolina Power & Light Co.  
RECIP.NAME    RECIPIENT AFFILIATION  
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SUBJECT: Forwards response to NRC 970131 ltr re violations noted in  
insp rept 50-400/96-11. Corrective actions: SG "A" feed flow  
red pen was reprimed to allow trace to be read.

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William R. Robinson  
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United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
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SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
REPLY TO NOTICE OF VIOLATIONS (NRC INSPECTION REPORT NO. 50-400/96-11)

Dear Sir or Madam:

Attached is Carolina Power & Light Company's reply to the Notice of Violations described in Enclosure 1 of your letter dated January 31, 1997.

Questions regarding this matter may be referred to Ms. D. B. Alexander at (919) 362-3190.

Sincerely,

MGW

Attachment

- c: Mr. J. B. Brady (NRC Senior Resident Inspector, HNP)
- Mr. N. B. Le (NRR Project Manager, HNP)
- Mr. L. A. Reyes (NRC Regional Administrator, Region II)

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**REPLY TO NOTICE OF VIOLATIONS  
NRC INSPECTION REPORT NO. 50-400/96-11**

**Reported Violation A:**

Technical Specification 6.8.1.a. requires written procedures to be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Item 1.a references procedures for operator log-keeping. Items 3.n and 5 reference procedures for the chemical and volume control system and for abnormal, offnormal or alarm conditions, respectively.

1. OMM-016, Revision 8, Operator Logs, Paragraph 5.1.b, Operations Shift Records, requires operators, in part, to check each operating recorder chart at least once per shift to ensure that pens are marking properly and timing correctly. It further requires operators to mark each chart with the time the check is performed and initial.

Contrary to the above, on December 4, 1996, the inspector identified where the licensee failed to assure, over an extended period of time, that the steam generator "A" feed flow red pen was properly marking the chart recorder as required.

2. APP-111, Revision 6, Freeze Protection and Temperature Maintenance, various sections, required operators to notify the main control room of heat trace alarms. Certain heat trace trouble alarms (in the radwaste control room) are associated with circuits which heat safety-related boric acid lines in the chemical and volume control system.

Contrary to the above, on December 12 and 13, 1996, operators failed to notify the main control room of several alarming conditions occurring locally at temperature maintenance panels affecting safety-related boric acid lines. The corresponding central alarm in the radwaste control room had been "locked in" for weeks such that operators were unaware of and therefore could not promptly respond to new local alarming conditions observed by the inspector.

This is a Severity Level IV violation (Supplement I).

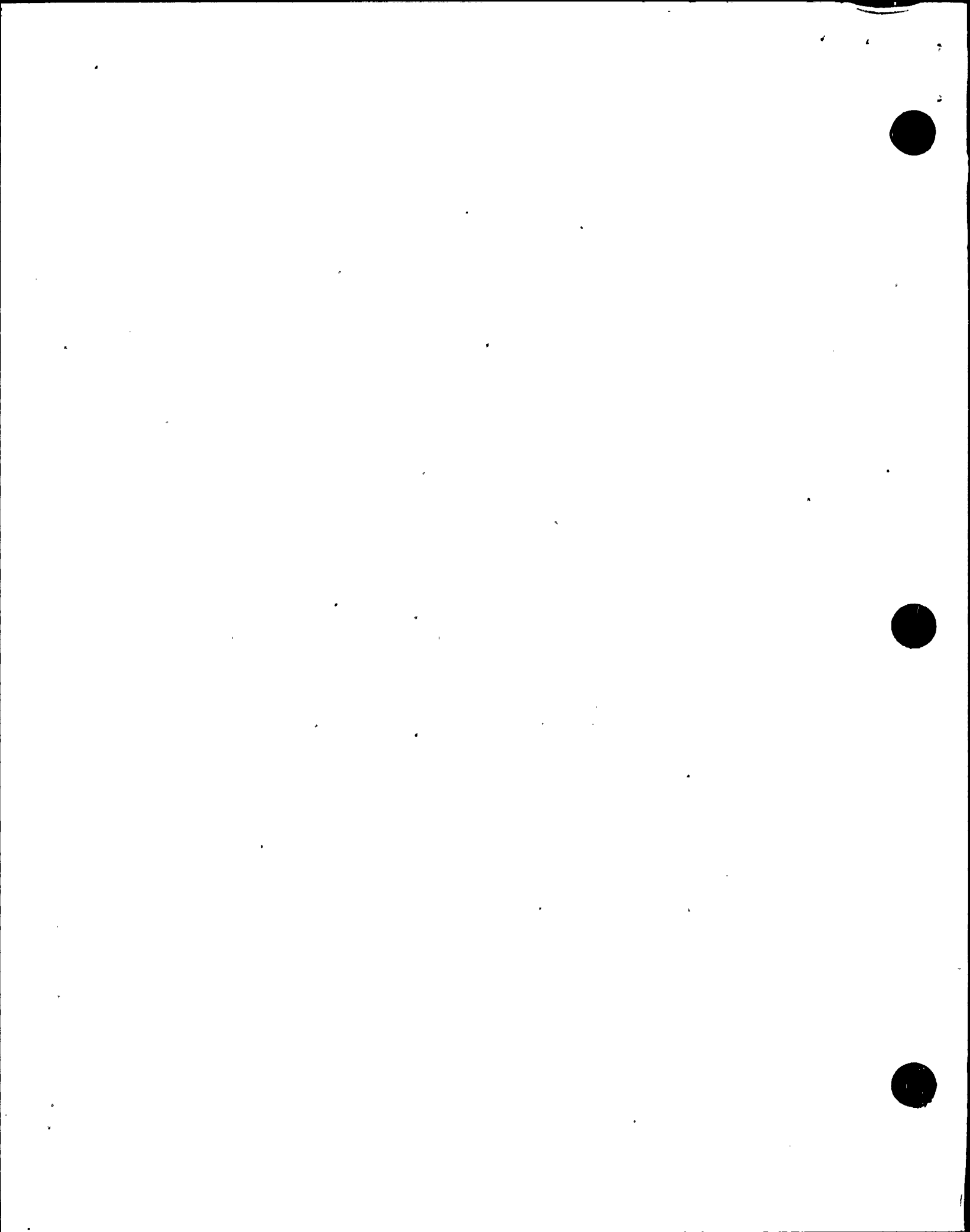
**Denial or Admission of Violation:**

The violation is admitted.

**Reason for the Violation:**

Example 1 and 2:

A contributor to the cause of both examples was lack of site personnel sensitivity to certain cumulative or chronic minor material deficiencies.



Reason for the Violation: (continued)

Example 1:

The operators involved in this violation were interviewed to determine if they knew the pen was not inking and to determine if anything contributed to their initialing off a chart that was not working properly. The operators interviewed generally thought that the chart recorder was working properly when they initialed it. The operators were aware of past problems with the reliability of these chart recorders. The suspected problem is that this recorder's red and green pens print one on top of the other generally which may cause the red pen to stop inking due to capillary action.

Example 2:

Due to the number of equipment deficiencies on the Temperature Maintenance System, some of the system's panels are staying in alarm continuously. In the instance cited by the inspector, the local panel remained in alarm due to several individual circuit failures. The alarm window in the radwaste control room remained sealed in. This condition existed through shift turnover such that the oncoming watch stander did not receive any new alarms. The procedural guidelines did not address actions to be taken for panels whose alarms could not be kept cleared out. Therefore, no notification was made to the Main Control Room and no field operator was dispatched to investigate the panel.

Although the panels described by the inspector contain circuits associated with the safety-related boric acid system, Technical Specification surveillance requirements for the boric acid system are implemented through the Harris Plants surveillance program which requires verification of proper temperature parameters of boric acid flow paths using local temperature readings taken by plant personnel. Therefore, operability of the system is being monitored.

Corrective Steps Taken and Results Achieved:

Example 1 and 2:

The use of the Operator Work-Around process for identifying low level accumulative equipment problems has been re-emphasized to appropriate operations personnel to ensure increased maintenance and engineering awareness of these issues.

Example 1:

1. Upon discovery, the steam generator "A" feed flow red pen was reprimed to allow a trace to be read.
2. An Operations Night Order was written on December 5, 1996, which re-emphasized the expectations for chart recorders and procedure compliance to operators.

Corrective Steps Taken and Results Achieved: (continued)

3. Interviews were conducted with the involved operators to ensure they were aware that they had initialed off the chart inappropriately and to ensure that they understand the requirements of OMM-016 regarding checking for proper chart recorder operation.
4. A design change has been developed and approved which will replace the standard recorder pen and inking system for some recorders with felt tip pens on an as needed basis.

Example 2:

1. An Operations Night Order was written on February 10, 1997 to implement interim corrective actions for panels that can not be kept in an alarm free state. The night order requires:
  - The oncoming RWCR operator will state which alarms associated with Freeze Protection or Temperature Maintenance Panels that are locked in on the radwaste control board at the shift turnover briefing and again at the mid-shift update meeting. This will ensure the operating crew is informed of panels that are not capable of alerting the RWCR operator of new alarm conditions.
  - Any panel that remains in an alarm condition such that the RWCR alarm window is sealed in will be checked twice per shift by the respective building operator to detect any new alarm conditions.
2. Increased attention by maintenance and engineering on Temperature Maintenance equipment has resulted in a significant reduction in the number of open deficiencies and the identification of several design changes needed to improve system performance and reliability. This effort will continue until the desired level of performance and reliability is achieved.

Corrective Steps That Will Be Taken to Prevent Further Violations:

Example 1 and 2:

Management's expectations regarding plant material condition will be re-emphasized to site personnel through a site-wide communication. This communication will be issued prior to the beginning of RFO 7 scheduled to begin in April 1997.

Example 2:

1. OMM-002, Shift Turnover Package, Attachment 11 will be revised to add a sign off for the RWCR operator to inform the respective building operator of any Freeze Protection or Temperature Maintenance panels that are causing sealed in alarms in the RWCR.





Corrective Steps That Will Be Taken to Prevent Further Violations: (continued)

2. APP-111, Freeze Protection and Temperature Maintenance, will be revised to direct the Main Control Room staff to implement OP-161.01 for alarms associated with these panels and to direct increased frequency monitoring for any panel that remains in continuous alarm.
3. OP-161.01, Operations Freeze Protection and Temperature Maintenance Systems, will be revised to direct the operator to report to the RWCR what conditions were discovered that caused the alarms and what action has been taken to reset the panel central alarm.

These procedure changes will be completed by June 17, 1997.

Date When Full Compliance Was Achieved:

Example 1:

Full compliance was achieved on December 4, 1996 when the steam generator "A" feed flow red pen was reprimed.

Example 2:

Full compliance was achieved on February 10, 1997 with the issuance of the Operations Night Order.

Reported Violation B:

Technical Specification 4.3.3.5.2 requires in part, that each Remote Shutdown System transfer switch, power and control circuit and control switch (required by the Shearon Harris Nuclear Power Plant Safe Shutdown Analysis to control Reactor Coolant System pressure) shall be demonstrated OPERABLE at least once per 18 months.

Contrary to the above, between September 2, 1995, and December 18, 1996, the licensee failed to test the remote shutdown system control circuit for block valve 1RC-115 associated with a reactor coolant system power operated relief valve. The valve had not been tested since the Spring 1994 refueling outage, approximately 32 months earlier.

This is a Severity Level IV Violation (Supplement I)

Denial or Admission of Violation:

The violation is admitted.



Reason for the Violation:

This information was contained in previously submitted Licensee Event Report (LER) 96-025-00, dated January 17, 1997.

Corrective Steps Taken and Results Achieved:

The following information was contained in previously submitted LER 96-025-00, dated January 17, 1997.

1. Testing of the remote shutdown function of IRC-115 was completed per procedure OST-9024T, Temporary Test For Testing IRC-115 ACP Control, on December 18, 1996.
2. Appropriate personnel involved in the OST-1813, Remote Shutdown System Operability 18 Month Interval Modes 5 or 6, procedure revision (Rev. 5) process in September 1995 were counseled on this event.

Corrective Steps That Will Be Taken to Prevent Further Violations:

The following information was contained in previously submitted LER 96-025-00, dated January 17, 1997.

1. Procedure OST-1813 will be revised to include testing of IRC-115 prior to its next performance in RFO 7, which is currently scheduled to begin in April 1997.
2. An assessment will be performed on a sample of procedure revisions completed to support the up-coming refueling outage (RFO 7). This assessment will be completed prior to the beginning of the outage which is currently scheduled to begin in April 1997.

Date When Full Compliance Was Achieved:

Full compliance was achieved on December 18, 1996 with the successful completion of OST-9024T which verified the remote shutdown function of IRC-115.

Reported Violation C:

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, requires that measures be established to assure that conditions adverse to quality such as deficiencies, deviations, and nonconformances are promptly identified and corrected. These requirements are further delineated in Section 12 of the licensee's corporate Quality Assurance Program Manual, Revision 18.

Contrary to the above, after September 1, 1996, when plant personnel identified that clearance tags had been improperly relied upon for nearly a year to implement design basis changes to the

Reported Violation C: (continued)

emergency service water system, the licensee failed to correct the adverse condition and issue a temporary modification to reflect associated valve lineup changes. No modification was issued until December 11, 1996, after the NRC inspectors questioned the practice of using valve clearance tags to implement design basis changes isolating emergency service water flow to two fan units, AH-86A and AH-86B, in order to ensure adequate flow to other safety-related parts of the system.

This is a Severity Level IV Violation (Supplement I)

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

Plant personnel were not sensitive to the need to implement a temporary modification earlier to ensure configuration control was maintained. Instead, completing the permanent modification that changed design, and operating procedures at a later date was considered sufficient. A note in the established clearance was considered sufficient to prevent restoration to the undesired valve lineup.

Corrective Steps Taken and Results Achieved:

1. Plant Modification ESR 9600284 which identified the necessary document changes associated with the existing valve lineups was approved on December 11, 1996.
2. Operating Procedure OP-139, Service Water System and the associated design drawings (flow diagrams) have been revised to reflect the approved valve lineups.
3. Procedure OMM-014, Operation of the Work Control Center, has been revised to require that for clearances and caution tags reviewed during quarterly audits that have been in effect greater than three months a Condition Report be generated to have the Responsible Engineer evaluate the system impact.
4. A review of outstanding Clearances, Caution Tags, and Equipment Inoperability Records (EIRs) was conducted and additional adverse conditions were identified where plant documentation requires updating. Some instances were identified where clearances, caution tags, or EIRs are used to maintain the analytical design basis of the plant. These adverse conditions will be resolved by temporary modification, modifications, and/or plant procedure changes prior to the completion of RFO 7. Other long standing clearance, caution tags, or EIRs will be scheduled for resolution as agreed to by plant management.



Corrective Steps That Will Be Taken to Prevent Further Violations:

1. Appropriate plant technical supervisory staff and operations personnel will be retrained on the need to maintain configuration control and the acceptable programs and processes for making changes to the plant. This action will be completed for available personnel prior to the beginning of RFO 7 scheduled to begin in April 1997. Personnel not available due to absence, vacation, other training, etc., will receive this training upon return to their work duties.
2. Management's expectations for prompt corrective action of adverse conditions will be re-emphasized to site personnel through a site-wide communication. This communication will be issued prior to the beginning of RFO 7 scheduled to begin in April 1997.

Date When Full Compliance Will Be Achieved:

Full compliance with the configuration control issues described in the violation will be achieved prior to completion of RFO 7 upon resolution of the additional adverse conditions (clearances, caution tags, or EIRs used to maintain the analytical design basis of the plant) as mentioned above.

